

**OPERATOR INSPECTION-SPECIFIC INFORMATION**

<b>Inspection Date(s):</b>	7/7/2015 through 7/9/2015		
<b>Name of Operator:</b>	LSP University Park, LLC		
<b>OPS Operator ID:</b>	32464		
<b>State/Other ID:</b>	IL		
<b>H.Q. Address:</b> 787 Industrial Drive University Park, IL 60484	<b>Company Officer:</b>	Carolyn Wass	
	<b>Title:</b>	Vice President	
	<b>Phone Number:</b>	(212) 615-3446	
	<b>Fax Number:</b>		
<b>Web Site:</b>		<b>Email Address:</b>	cwass@lspower.com
<b>Employees Covered by OQ Plan:</b>	28		
<b>Contractors Covered by OQ Plan:</b>	0		
<b>Total Mileage Represented:</b>	0.6		

Persons Interviewed	Title	Phone Number	Email Address
Gary Compton	Compliance Manager	(618)395-8588	gdc@ilgas.com

To add rows, press TAB with cursor in last cell.

OPS/State Representatives	Region/State
Aaron McElravy	IL

To add rows, press TAB with cursor in last cell.

**Remarks:**

This Operator Qualification ("OQ") Plan is utilized by Illinois Gas Company and its subsidiary Utility Safety and Design ("USDI"). USDI performs operations and maintenance tasks and emergency response for this operator. Questions regarding the OQ Plan and Records associated with the qualification of individuals can be obtained from the contact listed below.

Mike Wendling  
Gas Engineer (USDI)  
Phone: (618) 392-5502  
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mwendling@usdi.us

**Mileage Covered by OQ Plan (by Company and State)**

List each company and subsidiary separately, broken down by state (using 2-letter designation). If a company has intrastate and/or interstate mileage in several states, use one row per state. If there are both gas and liquid lines, use both the first and second table. For small gas operators (e.g. master meter, LP), use the third table.

**Jurisdictional to Part 192 (Gas) Mileage**

Company (Gas Operator)	Operator ID	State	Interstate Gathering	Intrastate Gathering	Interstate Transmission	Intrastate Transmission	Interstate Distribution*	Intrastate Distribution*	Remarks
LSP University Park, LLC	32464	IL				0.6			

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 195 (Hazardous Liquid) Mileage**

Company (Liquid Operator)	Operator ID	State	Interstate Transmission	Intrastate Transmission	Remarks

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 192 (Gas) Mileage – Small Operators**

Company (Small Gas Operator)	Operator ID	State	Small Gas (e.g., master meter)*	LP*	Remarks

(To add rows, press TAB with cursor in last cell.)

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter n/a.
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. \* Please do not include Service Line footage. This should only be MAINS.

**1 - Document Program Plan, Implementing Procedures and Qualification Criteria****1.01 Application and Customization of “Off-the-Shelf” Programs**

Does the operator’s plan identify covered tasks and does it specify task-specific reevaluation intervals for individuals performing covered tasks? [Enforceable] (**Associated Protocols: 1.05, 2.01, 5.02**)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The Plan identified covered tasks and reevaluation intervals Appendix C.  The covered tasks were identified utilizing the four part test.  A list of the covered tasks, span of control and requalification period is located in Appendix A.  Subsequent qualification criteria is listed in Section VI, E Page 11.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that operators have a written qualification program that includes provisions to identify covered tasks and the intervals at which reevaluation of the individual’s qualifications is needed. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The source of any off-the-shelf listing of covered tasks used by the operator;
2. The basis for the operator accepting or modifying any off-the-shelf listing of covered tasks;
3. Whether the operator has identified task-specific reevaluation intervals;
4. The basis for the task-specific reevaluation intervals.

**1.02 Contractor Qualification**

Does the operator employ contractor organizations to provide individuals to perform covered tasks? If so, what are the methods used to qualify these individuals and how does the operator ensure that contractor individuals are qualified in accordance with the operator’s OQ program plan?

\* Verify that the operator’s written program includes provisions that require all contractor and subcontractor individuals be evaluated and qualified prior to performing covered tasks, unless the covered task is performed by a non-qualified individual under the direction and observation of a qualified individual. [Enforceable] (**Associated Protocols: 1.05, 2.02, 3.02**)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan provides for the use of contractors, the plan requires the operator ensure the individuals are qualified before performing covered tasks on the pipeline. Section IX Page 16.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	

Check exactly one box above.	

**Guidance:** The operator is responsible for ensuring that all individuals, whether employees or contractors, are qualified to perform covered tasks. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Methods have been approved by the operator to qualify contractor individuals to perform applicable covered tasks.
2. Provisions have been established and documented to ensure contractors are required to perform covered tasks consistent with the operator's requirements.
3. Provisions have been established and documented to ensure effective communication of operator-specific requirements for task performance when qualified contractor individuals speak and comprehend languages other than English.
4. Provisions have been established and documented to ensure qualification program requirements are followed by contractors.
5. Provisions have been established and documented to ensure contractor individuals performing the operator's covered tasks are qualified.
6. Provisions have been established and documented to ensure the availability and maintenance of qualification records for contractor individuals performing covered tasks for the operator.

**1.03 Management of Other Entities Performing Covered Tasks**

Has the operator's OQ program included provisions that require individuals from any other entity performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) be evaluated and qualified prior to task performance?

\* Verify that other entities that perform covered task(s) on behalf of the operator are addressed under the operator's OQ program and that individuals from such other entities performing covered tasks on behalf of the operator are evaluated and qualified consistent with the operator's program requirements. [Enforceable] **(Associated Protocols: 1.05, 2.02)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes provisions for mutual assistance, the plan requires the approval of the OQ plan and covered task list before individuals can perform covered tasks. Section X Page 16
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that individuals performing covered tasks are evaluated and qualified to the requirements of the operator's program. This applies to operator employees, contractors hired by the operator, or agents such as other entities that perform the covered tasks. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The operator either (a) identifies provisions for assessing the evaluation criteria and methods used by other entities performing covered tasks to qualify an individual and to determine if the qualification is consistent with operator requirements, or (b) requires these individuals to be reevaluated.

**1.04 Training Requirements (Initial Qualification, Remedial if Initial Failure, and Reevaluation)**

Does the operator's OQ program plan contain policy and criteria for the use of training in initial qualification of individuals performing covered tasks, and are criteria in existence for re-training and reevaluation of individuals if qualifications are questioned? [Enforceable] (**Associated Protocols: 5.02**)

<input checked="checked" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The training requirements are contained in Section V Page 9 and include training for failure to requalify or if the individual has been disqualified.  The evaluation process is located in Section VI Pages 9-10.  Staff reviewed training records for individuals performing covered tasks.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** Training is a means to ensure that an individual performing a covered task has the necessary knowledge and skills to perform the task in a manner that ensures the safe operation of pipeline facilities, as required by the Pipeline Safety Act. As such, it should be incorporated in practices leading to the development and qualification of new employees, as well as in refreshing or expanding the knowledge and skills of individuals with considerable experience. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

The role of training in the qualification of individuals to perform covered tasks is best exemplified in:

1. Development of new hires,
2. Preparation for performing new or additional tasks,
3. Correction of deficiencies resulting from evaluation or reevaluation processes,
4. Correction of individual performance problems (e.g., contributing to an incident or accident through performance of covered tasks),
5. Indoctrination of changes in practices or procedures used in performing covered tasks.

**1.05 Written Qualification Program**

Did the operator meet the OQ Rule requirements for establishing a written operator qualification program and completing qualification of individuals performing covered tasks?

\* Verify that the operator's written qualification program was established by April 27, 2001. [Enforceable]

\* Verify that the written qualification program identified all covered tasks for the operator's operations and maintenance functions being conducted as of October 28, 2002. [Enforceable]

\* Verify that the written qualification program established an evaluation method(s) to be used in the initial qualification of individuals performing covered tasks as of October 28, 2002. [Enforceable]

\* Verify that all individuals performing covered tasks as of October 28, 2002, and not otherwise directed or observed by a qualified individual were qualified in accordance with the operator's written qualification program. [Enforceable] (**Associated Protocols: 3.01, 7.01**)

***PHMSA (OQ) Inspection Form 14 (Rev.6) December 15, 2008 with Guidance***

<input checked="checked" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> A new plan was created on January 18, 2012. The detailed revisions are located in the front of the OQ Plan. The last revision date was March 6, 2015.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator meet certain prescriptive requirements for establishing a written qualification program, identifying covered tasks, and qualifying individuals to perform the identified covered tasks. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Clear responsibilities for implementing the elements of the program (e.g., evaluation & qualification, training, record keeping, contracting) have been established and communicated to managers and supervisors within the organization.
2. The OQ program requirements have been consistently implemented by the operator's organization.
3. Key terms have been defined and provided to all entities involved in implementing the OQ program to avoid ambiguities and misinterpretations.

## 2 - Identify Covered Tasks and Related Evaluation Methods

### 2.01 Development of Covered Task List

How did the operator develop its covered task list?

\* Verify that the operator applied the four-part test to determine whether 49 CFR Part 192 or 49 CFR Part 195 O&M activities applicable to the operator are covered tasks. [Enforceable]

\* Verify that the operator has identified and documented all applicable covered tasks. [Enforceable]

(Associated Protocols: 8.01)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The utility conducted an analysis of activities performed on its pipeline facilities. The four part test was applied to determine which activities were covered tasks. Section III Pages 7-8.  The operator maintains a master list of covered task performed on the pipeline, span of control ratio and requalification intervals for the covered tasks. Section XI, Appendix A, Pages 17-18.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator identify covered tasks, which are those tasks covered by regulations that meet the four-part test set forth in the Operator Qualification Rule. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The method used by the operator to develop its covered task list was thorough, documented, and considered all tasks performed to meet applicable regulatory requirements by employees and contractors.
2. The operator understands the personnel qualification-related activities that pose significant risk to the integrity of pipeline facilities (e.g., excavation and backfilling) and has considered them in the development of its covered task list.
3. The operator identifies how it ensures the addition, revision, or deletion of covered tasks to incorporate changes to operations or regulations.
4. The operator definition of operations and maintenance is consistent with regulatory requirements as they are applied to pipeline facilities.
5. The operator identifies the individuals that are qualified to perform the covered tasks.
6. Review the coverage of each covered task to ensure the task is not too broad of a category, especially for contractors' use (e.g. Corrosion Control).

### 2.02 Evaluation Method(s) (Demonstration of Knowledge, Skill and Ability) and Relationship to Covered Tasks

Has the operator established and documented the evaluation method(s) appropriate to each covered task?

\* Verify what evaluation method(s) has been established and documented for each covered task. [Enforceable]

\* Verify that the operator's evaluation program ensures that individuals can perform assigned covered tasks. [Enforceable]

\* Verify that the evaluation method is not limited to observation of on-the-job performance, except with respect to tasks for which OPS has determined that such observation is the best method of examining or testing qualifications. The results of any such observations shall be documented in writing. [Enforceable] **(Associated Protocols: 3.01, 3.02)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes the evaluation methods located in Section VI, B Page 10. The plan includes evaluation requirements to determine the knowledge, Skills and abilities of the individual performing the covered tasks.  The plan is not limited to on-the-job-performance. The evaluator determines the individual's ability to perform covered tasks and recognize and react to abnormal operating conditions.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The operator is responsible for ensuring that all individuals whether employees or contractors, have been evaluated using one or more of the evaluation methods identified in the OQ rule and can perform the covered tasks assigned to them. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The evaluation methods used for qualification of individuals performing covered tasks are derived from the requirements of the covered tasks, and consider any unique needs (e.g., the inability to read) of the individuals being evaluated.
2. Evaluation methods are consistently applied across the operator's organization such that all individuals performing the same covered task are evaluated using consistent methods.
3. Evaluation methods of operator employees and contractors include the evaluation of an individual's knowledge, skills, and abilities to ensure that the individual can perform the assigned covered tasks.
4. Evaluations consisting of observations of on-the-job performance are limited to tasks where justification for employing this method has been established by the operator. The results of any such observations are documented in writing.
5. The written program should specify the certifications that are accepted for performance of covered tasks (by company and contract individuals) and specific re-evaluation intervals that are associated with the certifications.

**2.03 Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals)**

Does the operator have a process for managing qualifications of individuals performing covered tasks during program integration following a merger or acquisition (applicable only to operators engaged in merger and acquisition activities)?

\* Verify that the OQ program describes the process for ensuring OQ qualifications, evaluations, and performance of covered tasks during the merger with or acquisition of other entities. [Enforceable] **(Associated Protocols 3.01 3.02)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b>
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<input type="checkbox"/> Potential Issues Identified (explain)	<p>The plan includes provisions for mergers and acquisitions located in Section VII, D Pages 14-15.</p> <p>The plan includes the retention of employees or the qualification of new employees before completing covered tasks.</p>
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** Every company (in a “growth by merger or acquisition” mode) has a due diligence procedure (checklist and/or process) that they follow when investigating a target acquisition. The operator’s OQ program must at least incorporate the due diligence procedure by reference and include sufficient detail to ensure that the following requirements are met:

1. The acquired company’s “qualification/evaluation methods” for each covered task are verified as being compatible with the operator’s own procedures, thereby indicating that all qualified individuals to be acquired will be qualified under the operator’s own OQ program (including all necessary qualification records and other documentation).
2. If the previous guideline is found to be not applicable for any covered task, the operator will (for each covered task where existing qualifications are deemed to be inadequate):
  - a. Train (as appropriate) and re-evaluate acquired individuals; and
  - b. Ensure that no acquired individual is allowed to independently perform any covered task for which they are deemed not qualified unless under the direction and observation of a qualified individual.
3. The operator’s program plan should provide for addressing not only employees of the acquired company, but also any contractors that may need to continue performing covered tasks on the facilities being acquired, whether or not on a temporary basis.
4. The operator’s program plan should address the possibility that the acquired company may have equipment not previously used by the operator, and for which none of his own employees or contractors may be qualified. In such cases, procedures similar to guideline 2 must apply for the operators own employees and/or contractors until they become qualified to operate and maintain such equipment.

### 3 - Identify Individuals Performing Covered Tasks

#### 3.01 Development/Documentation of Areas of Qualification for Individuals Performing Covered Tasks

Does the operator's program document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

\* Verify that the operator's qualification program has documented the evaluation of individuals performing covered tasks. [Enforceable]

\* Verify that the operator's qualification program has documented the qualifications of individuals performing covered tasks. [Enforceable] (**Associated Protocols: 4.02, 7.01**)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> Staff reviewed qualification records including written tests, evaluations and training documentation.  The qualification of individuals are documented in accordance with the written procedures for the evaluation process located in Section VI Pages 9-13.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator ensure through evaluation that individuals performing covered tasks are qualified, and that records supporting an individual's current qualification be maintained while the individual is performing a covered task. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Documentation of the qualification of individuals (including contractors) performing covered tasks is maintained and is retrievable by work supervisors to support assignment of individuals to perform covered tasks.
2. Methods such as a current hard copy list, qualification card, central electronic database, or other forms of covered task qualification information are used to verify the qualifications of individuals performing covered tasks.
3. Ensure that the operator has established criteria for level of performance (e.g. 80% for passing a written evaluation, 100% for performance evaluation) to be qualified to perform covered tasks.
4. Question operator about missed portions of an evaluation. Specifically, how are the portions that were incorrectly addressed by the individual given as feedback to the individual?

#### 3.02 Covered Task Performed by Non-Qualified Individual

Has the operator established provisions to allow non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?

\* Verify that the operator's program includes provisions for the performance of a covered task by a non-qualified individual under the direction and observation by a qualified individual. [Enforceable] (**Associated Protocols: 2.01, 2.02**)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b>
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<input type="checkbox"/> Potential Issues Identified (explain)	<p>The plan allows for the use of non-qualified individuals located in Section VI, F Page 12.</p> <p>The Plan outlines the requirements for such instances including a qualified individual directs and observes the individual, the qualified individual understands he/she is responsible for that covered task, the ratio is not exceeded and the qualified individual can recognize and respond to AOC's.</p>
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule allows the performance of a covered task by a non-qualified individual if that individual is directed and observed by an individual qualified to perform the covered task. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Consideration has been given to tasks that cannot or should not be performed by non-qualified individuals under the direction and observation of a qualified individual, due to their complexity or due to the critical nature of the task.
2. For tasks where appropriate, guidance on the span of control by qualified individuals of non-qualified individuals has been established on a task-specific basis.
3. Provisions have been established and documented to ensure the ability of qualified individuals to effectively communicate direction of task activities and reactions to AOCs to unqualified individuals who speak and comprehend languages other than English.

## 4 - Evaluate and Qualify Individuals Performing Covered Tasks

### 4.01 Role of and Approach to "Work Performance History Review"

Does the operator use work performance history review as the sole method of qualification for individuals performing covered tasks prior to October 26, 1999, and does the operator's program specify that work performance history review will not be used as the sole method of evaluation for qualification after October 28, 2002?

\* Verify that after October 28, 2002, work performance history is not used as a sole evaluation method. [Enforceable]

\* Verify that individuals beginning work on covered tasks after October 26, 1999 have not been qualified using work performance history review as the sole method of evaluation. [Enforceable]

(Associated Protocols: 2.02)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan does not utilize work performance history as a sole method of qualification.  Evaluation methods are located in Section VI, B Page 10 and includes written examination and evaluation to determine their knowledge, skills and abilities.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator ensure through evaluation that individuals performing covered tasks are qualified, and that one or more of the methods identified in the rule are used for evaluation. Work performance history review is an allowed evaluation method for initial qualification of individuals performing covered tasks prior to October 26, 1999, but may not be used as a sole method of evaluation for subsequent evaluations, or for initial evaluations for qualification after October 28, 2002. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The operator has established criteria for the use of work performance history review as an evaluation method.
2. The operator did not use work performance history review as an initial evaluation method, or used it sparingly and with documented justification.
3. The operator's written program plan and/or evaluation documentation identifies that after October 28, 2002, work performance history review will not be used as the sole method of evaluation for qualification, and that work performance history will not be used as a sole evaluation method for subsequent qualification.

### 4.02 Evaluation of Individual's Capability to Recognize and React to AOCs

Are all qualified individuals able to recognize and react to AOCs? Has the operator evaluated and qualified individuals for their capability to recognize and react to AOCs? Are the AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task? Has the operator established provisions for communicating AOCs for the purpose of qualifying individuals?

\* Verify that individuals performing covered tasks have been qualified in recognizing and reacting to AOCs they may encounter in performing such tasks. [Enforceable] (Associated Protocols 3.01)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b>
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<input type="checkbox"/> Potential Issues Identified (explain)	<p>The plan requires the individual to recognize and react to an Abnormal Operating Conditions (“AOC’s”) during the field evaluation process located in Section VI, C Pages 10-11.</p> <p>The AOC’s are specific to the covered task being performed and are included on the evaluation form for the evaluator to determine recognition and response.</p>
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The ability to recognize and react to AOCs is required for qualification of individuals to perform covered tasks, whether the individuals are employed by the operator or are contractor individuals. The operator must demonstrate that the ability to recognize and react to AOCs is a part of each individual’s evaluation for qualification. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. AOCs used for evaluation of individuals performing covered tasks consist of those AOCs that the operator can reasonably anticipate the individual will encounter while performing the covered task.
2. In addition to task-specific AOCs (i.e., those that may be caused by performance of the task), generic AOCs (i.e., those that may reasonably be encountered during performance of the task) have been identified and used in qualification in cases where special requirements and conditions for the task being performed must be considered.
3. Evaluation methods for both employees and contractor individuals include evaluation of the appropriate reaction of an individual upon recognition of an AOC.
4. The operator utilizes incident/accident investigations, employee feedback programs, or other approaches to ensure that the AOCs identified and used in evaluating individuals are representative of those that could reasonably be anticipated during performance of covered tasks.

## 5 - Continued/Periodic Evaluation of Individuals Performing Covered Tasks

### 5.01 Personnel Performance Monitoring

Does the operator's program include provisions to evaluate an individual if the operator has reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?

\* Verify that the operator's program ensures re-evaluation of individuals whose performance of a covered task may have contributed to an incident or accident. [Enforceable]

\* Verify that the operator has established provisions for determining whether an individual is no longer qualified to perform a covered task, and requires reevaluation. [Enforceable]

(Specific Protocols: 2.02)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes reasonable cause to verify qualifications located in Section VI, H Pages 12-13. The items that are addressed include absenteeism, transfer between departments, loss of motor skills, employee determination, prolonged periods of non- performance, willful or repeated failures and observation of a covered task performed incorrectly.  The requirements for the performance of an individual that may have contributed to an incident are located in Section IV, G Page 12 and includes suspension if it is determined the individual's performance contributed to an incident until the individual can be requalified based upon the initial qualification process.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191 or an accident as defined in Part 195, or evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Methods and documentation exist to determine if individuals are performing covered tasks properly. These methods may include, but not be limited to: internal audits, third-party audits or inspections, assessments of procedure compliance, supervisor reviews, or assessment by a technical specialist.
2. The operator has established criteria and documentation requirements for determining if someone is no longer qualified (e.g., mental or physical impairment, rule change, procedural change).
3. Ensure that individuals under investigation are either re-evaluated or cleared of suspicion prior to further performance of the covered task(s).
4. Review the operator's accident/incident investigation form to ensure that a correlation

between the performance of OQ covered tasks and the investigation is documented or linked.

**5.02 Reevaluation Interval and Methodology for Determining the Interval**

**Has the operator established and justified requirements for reevaluation of individuals performing covered tasks?**

\* Verify that the operator has established intervals for reevaluating individuals performing covered tasks. [Enforceable] **(Associated Protocols: None)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes intervals for requalification based upon consistency with other operators, frequency of the task being performed, safety sensitivity, complexity, regulatory requirements and the availability of evaluations Section VI, E Page 11. The operator has chosen 3 year intervals for most covered tasks.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The OQ Rule and PSIA 2002 requires that an operator identify covered tasks and the intervals at which evaluation of the individual's qualification is needed. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Basis for the reevaluation intervals considering regulatory practice and/or performance history for similar tasks,
2. Consideration of the need for task-specific reevaluation intervals,
3. Justification of reevaluation intervals considering the complexity, criticality, and frequency of performance of the task.

## 6 - Monitor Program Performance; Seek Improvement Opportunities

### 6.01 Program Performance and Improvement

Does the operator have provisions to evaluate performance of its OQ program and implement improvements to enhance the effectiveness of its program? [Non-enforceable]

(Associated Protocols: None)

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes provisions to evaluate the performance of the OQ plan located in Section IV, D Page 9.  As part of the annual review the effectiveness will be determined by ensuring the field evaluations are representative of the actual field work.  Staff reviewed field evaluations for individuals performing covered tasks.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** Although there are no specific requirements in the rule for the operator to review the OQ program periodically and seek to implement improvements over time, it is reasonable that improvements will be identified that should be incorporated into the program as the program matures and the operator gains valuable feedback through a continuing review of performance trends. This item investigates whether the operator has anticipated the evolutionary nature of its program and has established provisions to identify and assess improvement opportunities and implement those that will result in greater program effectiveness and an increased level of safety. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. The operator has documented in its OQ plan a periodic requirement for program review.
2. The operator is actively involved in industry groups that seek to improve OQ programs and establish practices that will be identified and documented in consensus standards.
3. A review process has been established by the operator to assemble feedback on program effectiveness and needed improvements, and to periodically assess the feedback to identify improvements that should be made to the OQ program.



## 7 - Maintain Program Records

### 7.01 Qualification "Trail" (i.e., covered task; individual performing; evaluation method(s); continuing performance evaluation; reevaluation interval; reevaluation records)

Does the operator maintain records in accordance with the requirements of 49 CFR 192, subpart N, and 49 CFR 195, subpart G, for all individuals performing covered tasks, including contractor individuals?

- \* Verify that qualification records for all individuals performing covered tasks include the information identified in the regulations. [Enforceable]
- \* Verify that the operator's program ensures the retention of records of prior qualification and records of individuals no longer performing covered tasks for at least five years. [Enforceable]
- \* Verify that the operator's program ensures the availability of qualification records of individuals (employees, contractors and third party entities) currently performing covered tasks, or who have previously performed covered tasks. [Enforceable] **(Associated Protocols: 1.05, 3.01)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The procedure for record keeping is located in Section VIII Page 15. The plan includes retention of records for individuals no longer performing covered tasks for a period of 5 years.  Staff reviewed qualification records of 4 individuals who no longer perform covered tasks on the pipeline. Records were maintained in accordance with written procedures for record retention located in Section VIII Pages 15-16.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires certain information to be included in records of qualification for individuals performing covered tasks, and that these records be retained for at least five years. Although not identified specifically, records that are specified in the OQ plan and documentation that is required to demonstrate compliance with rule provisions should logically have retention requirements as part of the OQ program implementation. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Supporting documentation for implementation of the OQ program, including documentation of:
  - i. The methodology for identifying covered tasks;
  - ii. The reevaluation interval for each covered task and the basis for the reevaluation interval chosen; and
  - iii. The approach used to select individuals for evaluation and qualification.
2. The operator has considered the need for periodic back-up of qualification database information, whether in-house databases or industry databases, to ensure continued availability of information required to meet rule provisions.
3. The operator has established provisions to ensure the continued presence and availability of contractor records for individuals currently performing, or who have previously performed, covered tasks for the operator.

## 8 - Manage Change

### 8.01 Management of Changes (to Procedures, Tools, Standards, etc.)

Does the operator's OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?

- \* Verify that the operator's program identifies changes that affect covered tasks and how those changes are communicated, when appropriate, to affected individuals. [Enforceable]
- \* Verify that the operator's program identifies and incorporates changes that affect covered tasks. [Enforceable]
- \* Verify that the operator's program includes provisions for the communication of changes (e.g., who, what, when, where, why) in the qualification program to the affected individuals. [Enforceable]
- \* Verify that the operator incorporates changes into initial and subsequent evaluations. [Enforceable]
- \* Verify that contractors supplying individuals to perform covered tasks for the operator are notified of changes that affect task performance and thereby the qualification of these individuals. [Enforceable] **(Associated Protocols 1.04)**

<input checked="" type="checkbox"/> No Issues Identified	<b>Inspection Notes:</b> The plan includes Change Management located in Section VII Pages 13-14. The Change Management process includes communication of the changes to entities that may affect a specific covered tasks including new equipment, regulatory requirements, or changes to the Operations and Maintenance Manual. The plan identifies examples of significant changes that will be communicated.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** The rule requires that the operator communicate changes that affect covered tasks to individuals performing those covered tasks. In order to perform this effectively, the operator must have a change management methodology so that it knows when changes are occurring, what changes have an impact on covered task performance, the relative significance of the change and how it affects the continued qualification of individuals, and mechanisms to effectively communicate changes to qualified individuals. Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

1. Identification of the methods used to communicate changes to affected individuals.
2. Means of ensuring that affected personnel are kept up-to-date on current requirements of the OQ program.
3. Changes to the OQ plan and revisions to the plan are made and communicated to the appropriate individuals, including contractor individuals.

### 8.02 Notification of Significant Program Changes

Does the operator have a process for identifying significant OQ written program changes and notifying the appropriate regulatory agency of these changes once the program has been reviewed?

\* Verify that the operator's written program contains provisions to notify OPS or the appropriate regulatory agency of significant modifications to a program that has been reviewed for compliance.  
[Enforceable] (**Associated Protocols: None**)

<input checked="checked" type="checkbox"/> No Issues Identified	Inspection Notes: The plan includes provisions for notifying the appropriate state regulatory agency for any significant changes located in Section VII, C Page 14.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

**Guidance:** Any operator whose program has been reviewed since October 28, 2002, and that makes significant changes to its OQ plan or program on or after December 17, 2004, must notify the inspecting agency (OPS Region or State Agency). Significant changes would include (but are not necessarily limited to) the following:

1. A change in the number of covered tasks identified by the operator,
2. A change in the evaluation methods or criteria for performing covered tasks;
3. Increases in the number of non-qualified individuals that may perform a covered task while being directed and observed by a qualified individual;
4. Wholesale changes made to an OQ Plan or Program, whether due to an overall effort to improve program performance, or due to a merger or acquisition that results in incorporating the best features of the competing plans and programs.
5. Recommend the operator send a letter to accompany the program that addresses the changes made to the program. The official notification should be addressed to headquarters.

**9 – Field Inspection Findings**

**Additional Inspection Notes**